



Submission

Submitter:	Mrs Caroline Rowley
Organisation Name:	Ethical Farming Ireland
Submission Title:	Objection to P1167-01
Submission Reference No.:	S010857
Submission Received:	30 December 2022

Application

Applicant:	Mr. Kevin Keenan
Reg. No.:	P1167-01

See below for Submission details.

Attachments are displayed on the following page(s).



Environmental Protection Agency Headquarters
PO Box 3000
Johnstown Castle Estate
County Wexford
Y35 W821

30 December 2022

Dear Sir/Madam

Ethical Farming Ireland objects to application number P1167-01 on the grounds set out below.

Relevant considerations according to primary legislation

According to section 52(2) of the Environmental Protection Agency Act 1992, in carrying out its functions, the Environmental Protection Agency (the Agency) shall inter alia:

- (a) keep itself informed of the policies and objectives of public authorities whose functions have, or may have, a bearing on matters with which the Agency is concerned;
- (b) have regard to the need for a high standard of environmental protection and the need to promote sustainable and environmentally sound development, processes or operations; and
- (c) have regard to the need for precaution in relation to the potentially harmful effect of emissions, where there are, in the opinion of the Agency, reasonable grounds for believing that such emissions could cause significant environmental pollution.

Greenhouse gases

The policies and objectives referred to in section 52(2)(a) include (without limitation) the Programme for Government¹, the Department of Agriculture, Food and the Marine (DAFM)'s publication 'Ag Climatise – A Roadmap towards Climate Neutrality'² (Ag Climatise) and the Climate Action Plan 2023³.

The Programme for Government (inter alia) commits Ireland to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050.

Ag Climatise states:

“In total, approximately 80% of the agricultural GHG inventory is related directly to the number of animals and the management of the manure they produce. This roadmap is based on stabilising methane emissions and a significant reduction in fertiliser related nitrous oxide emissions, leading to an absolute reduction in the agricultural greenhouse gas inventory by 2030. Any increase in biogenic

¹ <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

² <https://www.gov.ie/en/publication/07fbc-ag-climatise-a-roadmap-towards-climate-neutrality/>

³ <https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/>

methane emissions from continually increasing livestock numbers will put the achievement of this target in doubt.”

This last sentence is emphasized by the Climate Action Plan 2023, according to which agriculture is the largest source of Ireland’s emissions (33.3%).

It seems to Ethical Farming Ireland that none of these documents appears to model chicken or pig populations and accordingly, that the chicken and pig populations were assumed to remain stable.

Ammonia

In addition to the risks of Ireland breaching its greenhouse gas targets, approval of the application is likely to exacerbate Ireland’s existing breaches of its National Emission Reduction Target relating to ammonia, as set out in the Agency’s own publication entitled ‘Ireland’s Air Pollutant Emissions’⁴ and Teagasc’s report entitled ‘An Analysis of the Cost of the Abatement of Ammonia Emissions in Irish Agriculture to 2030’⁵.

It seems to Ethical Farming Ireland that none of these documents appears to model chicken or pig populations and accordingly, that the chicken and pig populations were assumed to remain stable.

Breach of assumptions

Contrary to the assumptions referred to above, the application envisages an increase of 124% in the number of chickens (from 38,000 to 85,000 chickens at any one time), with concomitant increases in greenhouse gases and ammonia emissions.

Risks

The proposed increase in livestock numbers pursuant to the application appears to increase the risks of Ireland (a) breaching the greenhouse gas emissions targets to which it has committed and (b) exacerbating its existing non-compliance with its target in relation to ammonia.

Duty of the Agency

Failure by the Agency to take the above mentioned risks into account in considering the application would breach sections 52(2)(a), (b) and (c) of the Environmental Protection Agency Act, 1992.

Conclusion

Ethical Farming Ireland urges the Agency to reject the application.

Yours faithfully



Caroline Rowley
Director
Ethical Farming Ireland

⁴ https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/Air-Pollutant-Emissions-Report-2022_final.pdf

⁵ <https://www.teagasc.ie/media/website/publications/2020/NH3-Ammonia-MACC.pdf>